

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MICHAEL BAUER.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:09-cv-2116 TIA
)	
JEFFERSON COUNTY, MISSOURI, et al.,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULING PLAN

COME NOW the parties, by and through their attorneys, and respectfully submit a Joint Proposed Scheduling Plan pursuant to this Court's Order of April 2, 2010 (Doc. # 19):

I. Scheduling Plan:

1. This case has been appropriately assigned to Track 2 (Standard).
2. All motions for joinder of additional parties or amendment of the pleadings should be filed no later than December 20, 2010.
3. Discovery shall proceed in the following manner:
 - (a) The parties shall make all disclosures required by Fed.R.Civ.P. 26(a)(1), no later than June 1, 2010.
 - (b) Experts
 - 1) Plaintiff shall disclose all expert witnesses and shall provide the reports required by Fed.R.Civ.P. 26(a)(2) no later than September 1, 2010 and shall make expert witnesses a expected to testify at trial available for depositions no later than October 1, 2010.

- 2) Defendants shall disclose all expert witnesses and provide the reports required by Fed.R.Civ.P. 26(a)(2) no later than November 1, 2010 and shall make expert witnesses available for deposition no later than December 1, 2010.
- 3) Plaintiff shall disclose rebuttal experts and shall provide the reports required by Fed.R.Civ.P. 26(a)(2) no later than January 1, 2011 and shall make rebuttal experts available for depositions no later than January 31, 2011.
- (c) The presumptive limit of twenty-five (25) interrogatories per party as set forth in Fed.R.Civ.P. 33(a) shall apply. The presumptive limit of ten (10) depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A) shall apply.
- (d) The parties anticipate that there will be no requests for physical or mental examinations of parties pursuant to Fed.R.Civ.P. 35; however, any motions for such examinations shall be made by July 1, 2010.
- (e) The parties shall complete all discovery in this case no later than January 31, 2011.
4. The parties believe that referral of this action to Alternative Dispute Resolution would be useful and most productive by August 1, 2010.
5. Any dispositive must be filed no later than February 28, 2011. Any response shall be filed no later than March 28, 2011. Any reply shall be filed no later than April 11, 2011.

II. Trial.

The parties submit that this case will be ready for a jury trial on or after June 13, 2011. It is anticipated that the length of time to try the case to verdict is approximately five to seven days.

Respectfully submitted,

By: s/ Robert L. King

Robert L. King
365 Alta Dena Court
St. Louis, MO 63130
Direct: (314) 863-6902
Fax: (314) 863-7902

Anthony E. Rothert
American Civil Liberties
Union of Eastern Missouri
454 Whittier Street
St. Louis, MO 63108
Attorneys for Plaintiff

John N. Borbonus , III
King And Krehbiel, LLC
2000 S. Hanley Road
St. Louis, MO 63144-1524
Attorney for Defendant Jefferson County

D. Keith Henson
Paule And Camazine
165 N. Meramec Avenue
Sixth Floor
Clayton, MO 63105-3772
Attorney for Defendant Madison County